

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JAMES CONTANT, *et al.*,
Plaintiffs,

v.

BANK OF AMERICA
CORPORATION, *et al.*,
Defendants.

Case No.: 17-cv-3139-LGS
(related to No. 13-cc-7789-LGS)
ECF CASE

**PLAINTIFFS' RESPONSE TO DEFENDANTS BNP PARIBAS US WHOLESALE
HOLDINGS CORP.'S AND BNP PARIBAS SECURITIES CORP.'S
FIRST INTERROGATORY TO PLAINTIFFS**

Pursuant to Rule 26 and 33 of the Federal Rules of Civil Procedure, Plaintiffs James Contant, Sandra Lavender, Victor Hernandez, Martin-Han Tran, FX Primus Ltd., Carlos Gonzalez, Ugnius Matkus, Charles G. Hitchcock III, Jerry Jacobson, Tina Porter and Paul Vermillion ("Plaintiffs") hereby provide these Objections and Responses to Defendants' First Interrogatory.

INTERROGATORY

1. For each Plaintiff, Identify each RFED with which each such Person directly or indirectly transacted in FX Instruments and the period of time in which such transactions occurred with respect to each Plaintiff and each RFED.

RESPONSE:

James Contant transacted with the following RFEDs during the following periods of time:

- FOREX CAPITAL MARKETS LLC
 - April 23, 2009 through December 31, 2017

Sandra Lavender transacted with the following RFEDs during the following periods of time:

- PEREGRINE FINANCIAL GROUP INC.
 - December 31, 2011 through August 31, 2012

Victor Hernandez transacted with the following RFEDs during the following periods of time:

- PEREGRINE FINANCIAL GROUP INC.
 - March 1, 2010 through July 13, 2012

Martin-Han Tran transacted with the following RFEDs during the following periods of time:

- FOREX CAPITAL MARKETS, LLC
 - September 25, 2006 through March 3, 2017

FX Primus Ltd. transacted with the following RFEDs during the following periods of time:

- FOREX CAPITAL MARKETS, LLC
 - August 1, 2009 through December 1, 2015
- ALPARI (US) LLC
 - December 1, 2010 through January 15, 2015

Carlos Gonzalez transacted with the following RFEDs during the following periods of time:

- FOREX CAPITAL MARKETS, LLC
 - August 12, 2009 through February 22, 2017

Ugnius Matkus transacted with the following RFEDs during the following periods of time:

- PEREGRINE FINANCIAL GROUP INC.
 - January 1, 2009 through December 31, 2010
- FXDIRECTDEALER LLC
 - December 31, 2009 through December 31, 2013
- HF MARKETS LTD.
 - March 1, 2012 through April 30, 2012
- MB TRADING FUTURES INC.
 - January 1, 2011 through December 31, 2011
- DUKASCOPY BANK SA
 - December 31, 2009 through December 31, 2010

Charles G. Hitchcock, III transacted with the following RFEDs during the following periods of time:

- FXDIRECTDEALER LLC
 - November 24, 2010 through June 11, 2014
- FOREX CAPITAL MARKETS LTD. (UK)
 - June 14, 2010 through September 30, 2011
- FOREX CAPITAL MARKETS, LLC (US)
 - April 28, 2014 through September 9, 2016

Jerry Jacobson transacted with the following RFEDs during the following periods of time:

- PEREGRINE FINANCIAL GROUP, INC.
 - October 24, 2011 through November 16, 2012

Tina Porter transacted with the following RFEDs during the following periods of time:

- PEREGRINE FINANCIAL GROUP, INC.
 - December 1, 2009 to April 23, 2010
- CFS CAPITAL
 - June 1, 2009 through June 24, 2009

Paul Vermillion transacted with the following RFEDs during the following periods of time:

- OANDA CORPORATION
 - November 1, 2011 through December 31, 2013
- FOREX CAPITAL MARKETS, LLC
 - October 27, 2011 through December 31, 2013

We reserve our rights to supplement the response with newly found information pursuant to Rule 26(e) of the Federal Rules of Civil Procedure.

Dated: March 13, 2019

Respectfully submitted,

/s/ Garrett W. Wotkyns

Garrett W. Wotkyns
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*Counsel for Plaintiffs and
the Proposed Classes*

CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2019, a copy of the foregoing document were served upon all counsel via electronic mail.

Dated: March 13, 2019

/s/ Garrett W. Wotkyns
Garrett W. Wotkyns


VERIFICATION

I, Charles Hitchcock, III, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the foregoing is true and correct.

I am one of the Plaintiffs in the captioned action. I have read the foregoing Plaintiffs' Response to Defendant's Defendants BNP Paribas US Wholesale Holdings Corp.'s and BNP Paribas Securities Corp.'s First Interrogatory to Plaintiffs and know the contents thereof.

The information contained therein pertaining to my transactions with the RFEDs during the periods of time is true and accurate to the best of my knowledge, information and belief.

EXECUTED on March 13, 2019.



Charles Hitchcock, III